

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

OPTIS WIRELESS TECH., LLC, ET AL.,

Plaintiffs,

v.

HUAWEI TECHS. CO. LTD., ET AL.,

Defendants.

No. 2:17-cv-123 JRG-RSP

HUAWEI'S PROFFER OF CLAIM CONSTRUCTIONS FOR JURY INSTRUCTIONS

Defendants Huawei respectfully requests that the Court instruct the jury on the following claim constructions, which Huawei believes were erroneously rejected by the Magistrate Judge's January 18, 2018 Claim Construction Memorandum Opinion and Order.

I. U.S. Patent No. 6,604,216

Term	Construction
"ordering vector"	"a one-dimensional array of numbers, not implemented in an interleaver"
"reordering circuit for reordering...and generating"	"a circuit for reordering, without using an interleaver, the bits of ... and generating"

II. U.S. Patent No. 7,769,238

Term	Construction
"variable length code table"	"a table for transforming each value that denotes the number of non-zero coefficients in a block into a unique variable length code and vice versa"

Term	Construction
“generated by coding the number of the non-zero coefficients included in the current block”	“generated by transforming only the number of non-zero coefficients included in the current block into a variable length code”

III. U.S. Patent No. 8,358,284

Term	Construction
“wherein a first subset of the values is reserved for indicating the transport format of the protocol data unit and a second subset of the values, different from the first subset of values, is reserved for indicating the redundancy version for transmitting the user data”	“wherein a first subset of values is set aside just for transport format values of the protocol data unit and a second subset of the values is set aside just for redundancy version values for transmitting the user data”

IV. U.S. Patent No. 8,437,293

Term	Construction
“in response to”	“in response to . . . and not in response to the occurrence of any intermediate condition, event, or determination”

Dated: August 24, 2018

By: /s/ Robert T. Haslam

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document via the Court's CM/ECF system per Local Rule CV-5(a)(3) this 24th day of August 2018.

/s/ Robert R. Haslam